

Exhibit 8 Avoided Energy and Capacity Rate Design

I. Avoided Energy Rate Design

The following tables are intended to provide a visual indication of on-peak and premium peak hours by season based on DEC's and DEP's projected marginal costs (presented as "MC" in the tables) and projected loads. The legend defines the basis for the color shaded blocks, and the color-coded outlines define the current tariff energy period definitions. The projected hourly loads used for this analysis are net of renewable energy supply.

	Above the 85 percentile level
	>= Season average MC, but not Prem Pk
	Summer PM On-Pk, Shoulder AM & PM On-Pk, Winter AM On-Pk
	Summer AM On-Peak Hours, Shoulder Midday On-Pk, Winter PM On-Pk
	Premium Peak Hours

DEC

		----- Hour Ending ----->																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
		1am	2am	3am	4am	5am	6am	7am	8am	9am	10am	11am	12pm	1pm	2pm	3pm	4pm	5pm	6pm	7pm	8pm	9pm	10pm	11pm	12am
Summer	proj MC*	24	22	21	20	20	21	23	22	22	23	23	24	25	26	26	27	28	29	30	30	30	29	26	27
Summer	proj Loads*	9,476	8,794	8,319	8,040	8,004	8,308	9,062	9,323	9,760	10,217	10,780	11,335	11,892	12,443	12,870	13,268	13,694	13,882	13,907	13,790	13,461	12,762	11,654	10,486
Winter	proj MC*	34	32	32	33	35	38	44	38	35	31	28	26	24	23	23	25	29	33	35	35	34	33	31	36
Winter	proj Loads*	10,014	9,878	9,876	10,013	10,355	11,092	12,337	12,884	12,650	11,879	11,129	10,469	9,949	9,675	9,539	9,670	10,374	11,422	12,263	12,445	12,278	11,780	11,040	10,431
Shoulder	proj MC*	23	21	19	19	20	22	26	22	22	21	19	18	18	18	18	19	21	23	24	25	26	25	23	25
Shoulder	proj Loads*	8,096	7,771	7,606	7,596	7,811	8,425	9,546	9,854	9,794	9,473	9,199	8,961	8,835	8,834	8,882	9,051	9,577	10,110	10,630	10,958	10,858	10,314	9,473	8,676

* 2022 through 2031

DEP

		Hour Ending ----->																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
		1am	2am	3am	4am	5am	6am	7am	8am	9am	10am	11am	12pm	1pm	2pm	3pm	4pm	5pm	6pm	7pm	8pm	9pm	10pm	11pm	12am
Summer	proj MC*	23	22	21	20	19	21	23	21	22	22	23	24	24	25	26	27	28	29	30	30	30	29	26	27
Summer	proj Loads*	6,711	6,209	5,867	5,647	5,608	5,889	6,396	6,503	6,516	6,550	6,697	6,932	7,249	7,662	7,983	8,378	8,879	9,333	9,670	9,727	9,570	9,149	8,376	7,490
Winter	proj MC*	34	32	31	32	34	38	43	39	37	32	28	25	23	22	23	25	29	33	35	36	35	34	31	36
Winter	proj Loads*	6,895	6,778	6,795	6,913	7,248	8,003	9,110	9,505	8,777	7,780	6,850	6,087	5,594	5,424	5,451	5,767	6,660	7,913	8,621	8,779	8,709	8,405	7,862	7,329
Shoulder	proj MC*	22	20	19	18	19	22	26	22	22	21	19	18	17	17	18	19	21	23	24	26	26	24	22	25
Shoulder	proj Loads*	5,391	5,139	5,015	4,990	5,158	5,742	6,690	6,848	6,358	5,719	5,205	4,823	4,724	4,757	4,869	5,120	5,755	6,528	7,154	7,491	7,490	7,102	6,449	5,795

* 2022 through 2031

The shaded cells in the tables provide an indication of the hours in the day that reflect the relatively higher hourly marginal costs and net system loads. Logically, the hours showing the higher marginal costs and loads should coincide with the on-peak and premium peak pricing periods. The hours where the marginal costs (or net loads) are above the season average are considered to represent potential on-peak or premium peak hours, and those above the 85-percentile level guiding selection of the premium peak hours. The Companies do not propose a change in the premium hours.

The Companies did identify one issue when developing this analysis under the eleven energy pricing periods ordered by the Commission for DEC in Order No. 2019-881(A). The analysis shows the proposed DEC Shoulder midday Schedule PP energy credit rates are materially higher than the DEC Shoulder season off-peak energy credit rates. Because DEC Summer AM on-peak hours do not appear to be supported by this analysis, the Company has only proposed to eliminate the prior Summer AM on-peak period for DEC in this filing. No other changes in the energy-related rate design have been proposed.

II. Avoided Capacity Rate Design

Consistent with the methodology approved by the Commission in the 2019 avoided cost proceedings, DEC and DEP have updated their avoided capacity rate designs to reflect loss of load risk based on the 2020 Resource Adequacy Studies conducted by Astrapé Consulting, LLC.¹

¹ The 2020 Resource Adequacy Studies were filed with the Commission in Docket No. 2019-224-E and 2019-225-E on September 1, 2020, as Attachment III to the DEC and DEP 2020 IRPs, respectively.

DEC***Capacity Payment Period Definitions***

The loss of load risk table below for DEC shows that loss of load risk occurs primarily during winter AM hours for the months of December-March with some loss of load risk occurring during summer PM hours for the months of July and August. The DEC capacity payment hours have been redefined as shown below:

DEC Capacity Payment Period Definitions

	Dec-Mar	Jul-Aug
AM	HE 6-10	N/A
PM	N/A	HE 18-21

Seasonal Allocation Factor

The loss of load risk table shows a seasonal allocation of 96% Winter and 4% Summer. However, this allocation is based on the amount of solar projected in 2024, which was the study year for the 2020 Resource Adequacy Study. Consistent with the Commission's guidance in Order No. 2019-881(A), DEC has developed the seasonal allocation factors based on total connected solar projects plus projects with signed PPAs. The updated DEC seasonal allocation is provided below²:

DEC Seasonal Allocation

Winter	Summer
89%	11%

² See Order No. 2019-881(A), at 112 (directing the Companies to calculate avoided capacity costs based upon current conditions).

Month

4

DEP***Capacity Payment Period Definitions***

The loss of load risk table below for DEP shows that loss of load risk occurs exclusively during winter AM hours for the months of December-March. The DEP capacity payment hours have been redefined as shown below:

DEP Capacity Payment Period Definitions

	Dec-Mar
AM	HE 5-9

Seasonal Allocation Factor

The seasonal allocation for DEP shows that 100% of the loss of load risk occurs during the winter.

DEP Seasonal Allocation

Winter	Summer
100%	0%

DEP Loss of Load Risk (2020 Resource Adequacy Study)														
	Month												Winter	Summer
	1	2	3	4	5	6	7	8	9	10	11	12		
1	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%
2	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%
3	0.6%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	1.0%	0.0%
4	1.7%	0.8%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	2.8%	0.0%
5	6.3%	3.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	10.1%	0.0%
6	11.4%	6.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	18.7%	0.0%
7	16.4%	9.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%	27.9%	0.0%
8	20.0%	9.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	31.0%	0.0%
9	6.2%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.0%	0.0%
10	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%
11	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
12	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
22	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
23	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%
24	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
	64.0%	30.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.6%	100.0%	0.0%

III. DEC and DEP Avoided Energy and Capacity Pricing Periods

Energy Pricing Periods (2021 to 2019 Comparison)

Energy Price Blocks (2021)																									
Independent Energy Price Blocks		1.Summer Premium Peak (PM)			2.Summer On-Peak (PM)		3.Summer Off-Peak		4. Winter Premium Peak (AM)			5.Winter On-Peak (AM)			6.Winter On-Peak (PM)			7.Winter Off-Peak		8.Shoulder On-Peak		9.Shoulder Off-Peak		10.Shoulder Midday - Peak	
DEC Energy	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jun-Sep)		3.Off											2.On (PM)			1.Premium			2.On (PM)		3.Off				
Winter (Dec-Feb)		7.Off					5.On	4.Premium		5.On		7.Off					6.On (PM)				7.Off				
Shoulder (Remaining)		9.Off						8.On			10.Midday						8.On							9.Off	
DEP Energy	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jun-Sep)		3.Off											2.On (PM)			1.Premium			2.On	3.Off					
Winter (Dec-Feb)		7.Off				5.On (AM)		4.Premium		5.On (AM)		7.Off					6.On (PM)				7.Off				
Shoulder (Remaining)		9.Off					8.On			9.Off						8.On							9.Off		

Energy Price Blocks (2019)																										
Independent Energy Price Blocks			1.Summer Premium Peak		2.Summer On-Peak (PM)		3.Summer Off-Peak		4. Winter Premium Peak (AM)		5.Winter On-Peak (AM)		6.Winter On-Peak (PM)		7.Winter Off-Peak		8.Shoulder On-Peak		9.Shoulder Off-Peak		10.Summer On-Peak (AM)		11.Shoulder Midday-Peak			
DEC Energy	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
Summer (Jun-Sep)		3.Off							10.On (AM)					2.On (PM)				1.Premium				2.On (PM)		3.Off		
Winter (Dec-Feb)		7.Off					5.On	4.Premium		5.On	7.Off						6.On (PM)				7.Off					
Shoulder (Remaining)		9.Off						8.On				11. On Midday						8.On							9.Off	
DEP Energy	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
Summer (Jun-Sep)		3.Off													2.On (PM)			1.Premium				2.On		3.Off		
Winter (Dec-Feb)		7.Off				5.On (AM)	4.Premium		5.On (AM)	7.Off						6.On (PM)				7.Off						
Shoulder (Remaining)		9.Off					8.On				9.Off						8.On							9.Off		

Capacity Pricing Periods (2021 to 2019 Comparison)

Capacity Price Blocks (2021)																							
Independent Capacity Price Blocks				1. Winter Capacity								2 Summer Capacity											
DEC	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Summer (Jul - Aug)																			2.Summer				
Winter (Dec - Mar)								1.Winter															
DEP	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Summer (Jul - Aug)																							
Winter (Dec - Mar)								1.Winter															

Capacity Price Blocks (2019)																							
Independent Capacity Price Blocks				1. Summer Capacity								2. Winter Capacity (AM)								3. Winter Capacity (PM)			
DEC	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Summer (Jul - Aug)																			1.Summer				
Winter (Dec - Mar)								2.Winter												3.Winter (PM)			
DEP	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Summer (Jul - Aug)																			1.Summer				
Winter (Dec - Mar)								2.Winter												3.Winter (PM)			

SNIDER DEC/DEP EXHIBIT 3

Avoided Capacity Rate Design Pricing Periods¹**CAPACITY***Rates in Cents/KWH***Capacity Price Blocks**

1. Summer	DEC	DEP
	2.04	NA
2. Winter	6.76	10.29

DEC Capacity Price Blocks																									
Season	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jul-Aug)	Rates in Cents/KWH																		2.04	2.04	2.04	2.04			
Winter (Dec-Mar)	Rates in Cents/KWH						6.76	6.76	6.76	6.76	6.76														

DEP Capacity Price Blocks																									
Season	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jul-Aug)	<i>Rates in Cents/KWH</i>																								
Winter (Dec-Mar)	<i>Rates in Cents/KWH</i>					10.29	10.29	10.29	10.29	10.29															

¹ The 10-year Rate (cents/kWh) presents the avoided capacity rates set forth in Schedule PP and the Large QF tariffs for a distribution-connected QF.

SNIDER DEC/DEP EXHIBIT 3

Avoided Energy Rate Design Pricing Periods²**ENERGY**

Rates in Cents/KWH

Energy Price Blocks	DEC	DEP
1. Summer Premium Peak	3.19	3.22
2. Summer On-Peak	3.20	3.00
3. Summer Off-Peak	2.31	2.83
4. Winter Premium Peak	4.72	5.12
5. Winter On-Peak (AM)	3.90	3.92
6. Winter On-Peak (PM)	3.79	4.27
7. Winter Off-Peak	3.25	3.49
8. Shoulder On-Peak	3.21	3.04
9. Shoulder Off-Peak	2.33	2.61
10. Shoulder Midday Peak	2.76	NA

DEC Energy Price Blocks																									
Season	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jun-Sep)	Rates in Cents/KWH	2.31	2.31	2.31	2.31	2.31	2.31	2.31	2.31	2.31	2.31	2.31	2.31	3.20	3.20	3.20	3.20	3.19	3.19	3.19	3.19	3.20	3.20	2.31	2.31
Winter (Dec-Feb)	Rates in Cents/KWH	3.25	3.25	3.25	3.25	3.25	3.90	4.72	4.72	4.72	3.90	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.79	3.79	3.79	3.79	3.79	3.25	3.25
Shoulder (Remaining)	Rates in Cents/KWH	2.33	2.33	2.33	2.33	2.33	2.33	3.21	3.21	3.21	3.21	2.76	2.76	2.76	2.76	2.76	2.76	3.21	3.21	3.21	3.21	3.21	3.21	2.33	2.33

DEP Energy Price Blocks																									
Season	Hour Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Summer (Jun-Sep)	Rates in Cents/KWH	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	2.83	3.00	3.00	3.00	3.22	3.22	3.22	3.22	3.00	2.83	2.83	2.83
Winter (Dec-Feb)	Rates in Cents/KWH	3.49	3.49	3.49	3.49	3.92	3.92	5.12	5.12	5.12	3.92	3.92	3.49	3.49	3.49	3.49	3.49	3.49	3.49	4.27	4.27	4.27	4.27	3.49	3.49
Shoulder (Remaining)	Rates in Cents/KWH	2.61	2.61	2.61	2.61	2.61	3.04	3.04	3.04	3.04	3.04	2.61	2.61	2.61	2.61	2.61	2.61	2.61	3.04	3.04	3.04	3.04	3.04	3.04	2.61

² The 10-year Rate (cents/kWh) presents the avoided energy rates set forth in Schedule PP and the Large QF tariffs for a distribution-connected QF.